

**NEXTGEN COUNSEL LLC**

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*Attorneys for Defendants Titan Staffing Systems, Inc.*

*and William Almonte*

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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ANGELICA VELAZQUEZ, *on behalf of herself, FLSA*  
*Collective Plaintiffs, and the Class,*

Case No. 7:25-cv-04204

Plaintiff,

v.

MILMAR FOOD GROUP, LLC, MILMAR FOOD GROUP II, LLC, MILMAR LLC, TITAN STAFFING SYSTEMS, INC., MARTIN HOFFMAN, and WILLIAM ALMONTE,

Defendant.

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**NOTICE OF MOTION TO COMPEL  
ARBITRATION AND DISMISS  
COMPLAINT**

**PLEASE TAKE NOTICE** that, upon the accompanying Memorandum of Law, dated June 25, 2025, the Declaration of Michael H. Ansell, Esq., dated June 23, 2025, and the Declaration of William Almonte, dated June 23, 2025, Defendants Titan Staffing Systems, Inc. (“Titan”) and William Almonte (“Almonte”) (collectively, the “Titan Defendants”), by their counsel, will move this Court, before the Honorable Philip M. Halpern, United States District Judge, at the Hon. Charles L. Brieant, Jr., Federal Building and United States Courthouse, 300 Quarropas St., White Plains, NY 10601, for an Order compelling Plaintiff Angelica Velazquez’s (“Plaintiff”) to arbitrate all of the claims asserted in Complaint on an individual basis against all Defendants and dismissing Plaintiff’s Complaint pursuant to the Federal Arbitration Act (“FAA”), 9 U.S.C. § 4, and granting such other and further relief as the Court deems appropriate.

**NEXTGEN COUNSEL LLC**

*Attorneys for Defendants Titan Staffing Systems, Inc. and William Almonte*

/s/Michael H. Ansell

BY: MICHAEL H ANSELL, ESQ.

Dated: June 25, 2025

Motion denied without prejudice for failure to comply with Rule 4(C) of the Court's Individual Practices. Pursuant to Rule 4(C)(iii), Defendants Titan Staffing Systems, Inc. and William Almontemay may renew their request by filing a pre-motion letter in accordance with Rule 2(C) by July 11, 2025.

SO ORDERED.



Philip M. Halpern  
United States District Judge

Dated: White Plains, New York  
June 26, 2025